

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

GREGORY SCOTT,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO.: 2:06-cv-00654-VPM
)	
NORMENT SECURITY GROUP, INC.,)	
)	
Defendant.)	

**DEFENDANT'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Norment Security Group, Inc. ("Defendant"), by and through their undersigned attorney, respectfully move this Court to grant this unopposed motion for an extension of seven (7) days for Defendant to answer or otherwise respond to Plaintiff's Complaint. In support of their motion, Defendant states as follows:

1. On July 24, 2006, Plaintiff filed a Complaint against Defendant.
2. Defendant was served with the summons and Plaintiff's Complaint via certified mail on August 2, 2006.
3. Defendant's counsel has only recently received the relevant documents and needs a few days to prepare a proper response.
4. Defendant's counsel, Bruce J. Downey, III, conferred with Plaintiff's counsel, Braxton Schell, Jr., regarding the seven (7) day extension. **Plaintiff consents to the requested extension.**
5. This motion is made in good faith and is not filed for the purpose of causing delay.

WHEREFORE, Defendant respectfully requests that this Court enter an order allowing Defendant seven (7) days from the date of filing this motion in which to file an answer or otherwise respond to Plaintiff's Complaint.

Respectfully submitted,

/s/ Bruce J. Downey, III
Bruce J. Downey, III (DOW006)
bjd@chlaw.com

ATTORNEY FOR DEFENDANT NORMENT
SECURITY GROUP, INC.

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2006 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Braxton Schell, Jr., Esq.
BRAXTON SCHELL, JR., P.C.
1330 21st Way South, Suite 210
Birmingham, AL 35205

/s/ Bruce J. Downey
OF COUNSEL